

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Chapter 11

Case No: 22-10943 (MEW)

Judge Wiles

In re:

VOYAGER DIGITAL HOLDINGS INC., et al.,

Debtors.

**MOTION FOR ADMINISTRATIVE CLAIMS FOR PUNITIVE DAMAGES DONE BY
KIRKLAND & ELLIS, AND VOYAGER DIGITAL HOLDINGS INC., et al.,**

Dear Honorable Judge wiles,

I am motioning regarding the documents that were released online. My information was not redacted for the public. Voyager Digital Holdings and Kirkland and Ellis have failed to protect my right to privacy as a citizen and as a consumer. My personal coin purchases and deposits should not be for the public to see, nor should my personal bank deposits.

Moreover, As per the U.S. Bankruptcy Code, section 107, all documents filed in a bankruptcy case must be made available to the public, unless otherwise ordered by the court. Under

Section 326 of the Bankruptcy Code, debtors in possession are required to protect the privacy of individuals whose personal information is contained in bankruptcy filings.

In this case, Voyager Digital failed to protect my privacy by publicly releasing my financials without making any redactions, thus exposing personal financial information to the public. This violation of privacy is a direct contravention of the Bankruptcy Code and constitutes a breach of my rights. This action is in violation of Section 521(a)(1)(B)(iv) of the Bankruptcy Code, which requires debtors to file schedules of assets and liabilities that include redacted personal information to protect the privacy of individuals.

Furthermore, under 11 U.S. Code § 362(k), I am entitled to seek punitive damages for any willful violation of the automatic stay, which includes the protection of personal information in bankruptcy filings. The willful release of my client's financial information without proper redaction constitutes a breach of the automatic stay and warrants punitive damages.

Therefore, I ask this court to award punitive damages; as Voyager Digital's actions were willful, wanton, and malicious. Such damages would serve as a deterrent to other companies who might consider similar actions in the future and send a message that privacy violations will not be tolerated.

Submitted by,

Alah Shehadeh

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